

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

UNITED STATES DISTRICT COURT

for the

Middle District of Pennsylvania

Harrisburg Division

Case No.

1:25-cv-00690
(to be filled in by the Clerk's Office)

Maryann Butler

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

New American Funding
14511 Myford Road Suite 100
Tustin, California 92780

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Yes ☐ No ☐FILED
HARRISBURG, PA

APR 21 2025

PER

DEPUTY CLERK

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Maryann Butler
Street Address	1823 State Street
City and County	Harrisburg, Dauphin
State and Zip Code	Pennsylvania 17103
Telephone Number	717-424-8220
E-mail Address	Mfmallah87@icloud.com

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B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title *(if known)*. Attach additional pages if needed.

Defendant No. 1

Name	New American Funding
Job or Title <i>(if known)</i>	Lender
Street Address	14511 Myford Road Suite 100
City and County	Tustin, Orange County
State and Zip Code	California , 92780
Telephone Number	
E-mail Address <i>(if known)</i>	

Defendant No. 2

Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

Defendant No. 3

Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

Defendant No. 4

Name	
Job or Title <i>(if known)</i>	
Street Address	

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City and County _____

State and Zip Code _____

Telephone Number _____

E-mail Address (if known) _____

\\II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (check all that apply)

☒ Federal question☐ Diversity of citizenship☐

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

Equal Credit Opportunity Act (ECOA), 15 U.S.C. § 1691 – failure to issue an adverse action notice;
RESPA, 12 U.S.C. § 2601 – failure to transfer FHA case and disclose settlement info;
TILA, 15 U.S.C. § 1601 – lack of required loan disclosures;
FCRA, 15 U.S.C. § 1681 – unauthorized or excessive credit inquiries;
HUD Mortgage Letter 2009-40 – wrongful obstruction of FHA case transfer.

B. If the Basis for Jurisdiction Is Diversity of Citizenship

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, (name) _____, is a citizen of the
 State of (name) _____.

b. If the plaintiff is a corporation

The plaintiff, (name) _____, is incorporated
 under the laws of the State of (name) _____,
 and has its principal place of business in the State of (name) _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

a. If the defendant is an individual

The defendant, (name) _____, is a citizen of
the State of (name) _____. Or is a citizen of
(foreign nation) _____.

b. If the defendant is a corporation

The defendant, (name) New American Funding-Nations, is incorporated under
Lending Corporation d/b/a New
American Funding
the laws of the State of (name) California, and has its
principal place of business in the State of (name) Tustin, California.
Or is incorporated under the laws of (foreign nation) _____,
and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:

Bet, here's a tighter, more aggressive version that still hits hard and fits clean in the form:

"The amount in controversy exceeds \$75,000. Plaintiff seeks \$1,000,000 in total damages for obstruction of a federal mortgage transaction, loss of home equity, financial harm, and willful misconduct by Defendants, including punitive damages for gross negligence and delay."

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

"Plaintiff refers the Court to the attached 'Statement of Facts' (Attachment A) for a full account of the misconduct, including factual allegations of delay, obstruction of the mortgage process, and violations of federal lending laws. These include but are not limited to willful negligence, failure to issue required notices, and deprivation of access to key mortgage systems, resulting in financial harm and the loss of a time-sensitive mortgage opportunity."

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

"Plaintiff refers the Court to the attached "(Attachment B) "Prayer And Relief"

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: April 04, 2025

Signature of Plaintiff

Printed Name of Plaintiff


Maryann Butler

B. For Attorneys

Date of signing: _____

Signature of Attorney _____

Audury P.D. Davis

2041 Greenwood Street

Harrisburg, PA 17104

Phone: 717-424-8220

Email: MFMALLAH87@iCloud.com

April 16, 2025

Clerk of Court

United States District Court

Middle District of Pennsylvania

228 Walnut Street

Harrisburg, PA 17101

RE: Filing of Civil Complaint and Application to Proceed In Forma Pauperis

Plaintiff: Maryann Butler

Defendant: New American Funding

Dear Clerk of Court,

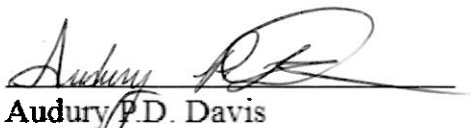
Enclosed please find the following documents for filing in the above-captioned matter:

1. Civil Complaint with Exhibits
2. Application to Proceed In Forma Pauperis (AO 239)
3. Declaration in Support of IFP
4. Summons in a Civil Action (AO 440)
5. Cover Sheet (JS-44)
6. Proof of Service (to be filed upon completion of service)

Plaintiff, Maryann Butler, is requesting leave to proceed in forma pauperis pursuant to 28 U.S.C. § 1915. I am submitting this packet on her behalf as her authorized representative.

Please file the enclosed documents accordingly and advise if, any additional materials are required to complete the filing.

Respectfully submitted,



Audury P.D. Davis

Authorized Representative for Plaintiff

Audrey P. Davis
7041 Greenwood St
Harrisburg Pa 17104



RECEIVED
HARRISBURG, PA

APR 21 2025

DEPUTY CLERK

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MIDDLE DISTRICT
CLERK OF COURT - U.S. DISTRICT COURT
Ronald Reagan Federal Building, US Courthouse
228 Walnut Street, Room 110
Harrisburg Pa 17101



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